UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VS.

Endowement.

In the Matter of the Arbitration Between

CONOPCO, INC.

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Petitioner,

NOTICE OF MOTION Civil Action No. 07-Civ-9458

on No. 07-Civ-9458

(LBS)

LORNAMEAD BRANDS, INC.,

Respondent.

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SIRS:

PLEASE TAKE NOTICE. That upon the annexed Declarations of Steven J. Rice, Esq. and Richard T. Sullivan, Esq. dated November 17, 2007, the Judgment Upon Arbitration Award, and all other Pleadings and Proceedings filed herein, the undersigned will move this Court before the Honorable Leonard B. Sand, United States District Court Judge for the Southern District of New York, on the 29th day of November at 2; 45 pm at Courtroom 15-A at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order pursuant to Section 12 of Title 9 of the United States Code staying enforcement of the Judgment Upon Arbitration pending resolution of an action commenced by the Respondent, Lornamead, Inc., against the Petitioner, Conopco, Inc., in this Court, and granting such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE, that Answering Papers, if any, shall be served upon the undersigned in compliance with the Federal Rules of Civil Procedure and the Rules of the United States District Court for the Southern District of New York.

MEMO ENDORSED

Dated: New York, New York November 17, 2006

Harris Beach PILC

By
Steven J. Rice, Esq. ID No 1934
Richard T. Sullivan, Esq.

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